

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN F. HALBLEIB,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC. et al.,

Defendants.

Case No. 1:15-cv-11141

Hon. John J. Tharp Jr.

Hon. Maria Valdez

MOTION FOR ENTRY OF AN AGREED CONFIDENTIALITY ORDER

Defendant Experian Information Solutions, Inc. (“Experian”), by its undersigned counsel, hereby requests that this Court enter the Agreed Confidentiality Order, attached as Exhibit A, and submitted separately to the Court. In support of this motion, Experian states as follows:

1. Plaintiff has served written discovery requests that encompass documents and information that includes sensitive, confidential, and trade secret material. Specifically, Plaintiff’s discovery requests encompass Experian’s internal operating guides, training manuals, and files that are proprietary in nature, and highly sensitive in light of Experian’s business as a credit reporting agency.
2. As of September 20, 2016, the remaining parties in this action have reviewed and agreed to the Agreed Confidentiality Order separately submitted to this Court.
3. No party opposes this motion.
4. In accordance with this Court’s standing order on governing the submission of proposed orders, Experian will submit the Agreed Confidentiality Order directly to the Court via email.

WHEREFORE, Experian respectfully requests that this Court enter the Agreed Confidentiality Order.

Dated: September 20, 2016

Respectfully submitted,

s/ Jamie N. Ward

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Counsel for Defendant

Experian Information Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2016, I caused a copy of the foregoing **Motion For Entry Of An Agreed Confidentiality Order** to be electronically filed with the Clerk of the U.S. District Court for the Northern District of Illinois through the CM/ECF system, which will electronically send notice to counsel for all parties that have appeared in this case.

s/ Jamie N. Ward

Attorney for Defendant
Experian Information Solutions, Inc.